

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of:)	
)	
Public Safety and Homeland Security Bureau)	RM-11433
Seeks Comment on National Public Safety)	
Telecommunications Council's Petition for)	
Rulemaking to Allow Aircraft Voice)	
Operations on Secondary Trunking Channels)	
in the 700 MHz Band)	

**COMMENTS OF
THE NATIONAL PUBLIC SAFETY TELECOMMUNICATIONS COUNCIL**

The National Public Safety Telecommunications Council (NPSTC) submits these Comments in response to the Commission's Public Notice in the above-captioned proceeding.¹ In these comments, NPSTC reaffirms its support for issuance of a Notice of Proposed Rulemaking (NPRM) to address public safety aircraft voice operations on secondary trunking channels in the 700 MHz band. NPSTC urges the Commission to move forward expeditiously with an NPRM on this issue.

¹ *Public Notice, DA 11-1146*, Public Safety and Homeland Security Bureau Seeks Comment on National Public Safety Telecommunications Council's Petition for Rulemaking to Allow Aircraft Voice Operations on Secondary Trunking Channels in the 700 MHz Band (RM-11433) released June 30, 2011.

The National Public Safety Telecommunications Council

The National Public Safety Telecommunications Council is a federation of public safety organizations whose mission is to improve public safety communications and interoperability through collaborative leadership. NPSTC pursues the role of resource and advocate for public safety organizations in the United States on matters relating to public safety telecommunications. NPSTC has promoted implementation of the Public Safety Wireless Advisory Committee (PSWAC) and the 700 MHz Public Safety National Coordination Committee (NCC) recommendations. NPSTC explores technologies and public policy involving public safety telecommunications, analyzes the ramifications of particular issues and submits comments to governmental bodies with the objective of furthering public safety telecommunications worldwide. NPSTC serves as a standing forum for the exchange of ideas and information for effective public safety telecommunications.

The following 15 organizations participate in NPSTC:

- American Association of State Highway and Transportation Officials
- American Radio Relay League
- Association of Fish and Wildlife Agencies
- Association of Public-Safety Communications Officials-International
- Forestry Conservation Communications Association
- International Association of Chiefs of Police
- International Association of Emergency Managers
- International Association of Fire Chiefs
- International Municipal Signal Association
- National Association of State Chief Information Officers
- National Association of State Emergency Medical Services Officials
- National Association of State Foresters
- National Association of State Technology Directors
- National Emergency Number Association
- National Sheriffs' Association

Several federal agencies are liaison members of NPSTC. These include the Department of Homeland Security (the Federal Emergency Management Agency, the Office of Emergency Communications, the Office of Interoperability and Compatibility, and the SAFECOM Program; Department of Commerce (National Telecommunications and Information Administration);

Department of the Interior; and the Department of Justice (National Institute of Justice, CommTech Program). NPSTC has liaison relationships with associate members, the Telecommunications Industry Association, the Canadian Interoperability Technology Interest Group, the National Council of Statewide Interoperability Coordinators and the Utilities Telecom Council.

NPSTC Comments

There are no frequencies in either the 700 or 800 MHz band identified for air-to-ground communications, an increasingly important tool for public safety. NPSTC believes that there are substantive public safety communications requirements across the country that could be satisfied by recommendations in its Petition. Given the broader viewpoint from the sky, public safety personnel in aircraft can significantly assist with on-scene coordination for law enforcement and serve as a key resource for fire suppression operations. In addition, public safety aircraft are of great assistance in speeding the transport of trauma victims to hospitals so advanced treatment can be provided expeditiously. In all these cases, communications to and from the public safety aircraft are essential to successful operations.

A recent inquiry of the Commission's Universal License System (ULS) shows that the specific secondary use 700 MHz channels recommended by NPSTC in its Petition are not currently licensed to any public safety organization.² However, in the event the Commission were to issue a license for "secondary trunking" on the recommended channels, air-to-ground use could still be managed by the appropriate Statewide Interoperability Executive Committee (SIEC) or pursuant to the Commission's rules, delegated to a 700 MHz Regional Planning Committee (RPC), to help avoid interference.³

² See [0004730586](#), an application filed by the State of Colorado for use of six of the eight frequencies. NPSTC notes that the Commission has not acted on this application.

³ See 47 CFR §90.525(b).

In summary, moving forward with a NPRM as recommended in the NPSTC petition would be a critical step in serving key public safety operational requirements, and at the same time, would allow more efficient use of the spectrum. Therefore, NPSTC believes the public interest would be served by moving forward with a Notice of Proposed Rulemaking to address the rule changes as recommended in its previously submitted petition.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ralph A. Haller", with a long horizontal flourish extending to the right.

Ralph A. Haller, Chairman
National Public Safety Telecommunications Council
8191 Southpark Lane, Number 205
Littleton, Colorado 80120-4641
866-807-475

July 15, 2011